

In The United States District Court
For The Eastern District of Oklahoma

FILED

MAY 10 2021

James Ezell III
Plaintiff

PATRICK KEANEY
Clerk, U.S. District Court

By Deputy Clerk

v.

6:19-CV-00302-JFH-SPS

Damon Heringer et al,
Defendant

Plaintiff Motion For Stay on Defendants
Motion To Depose

Comes now plaintiff prose pursuant to Fed. R. Civ. P. requesting Stay
on Defendants Motion To Depose for following reason as stated:

1. The plaintiff motion objecting to defendant Motion that was Granted
without plaintiff having proper Notice pursuant to Fed R. Civ. P. as plaintiff
is a party.
2. The plaintiff has a motion for appointment of counsel before this court
and deposition is so fundamental to allow it without counsel would be
unfair
3. The plaintiff is working with family and friend whom letter wrote
to plaintiff at this facility was returned to sender in retaliation allowed
my family and friends to come up with money for attorney Mr Arnett
with Arnett Law Firm

4. The plaintiff is presently in process of the payment to Mr. Arnett to represent me on April 28, 2021 a collect call was made to his office in which plaintiff was advised that Mr. Arnett is presently in jury trial and his earliest appointment visit is at least a month away.

5. Therefore plaintiff request this stay so that his family could make the payment of his request to represent plaintiff and it would allow Mr. Arnett to be present during any "depose" any enter appearance of counsel as well as necessary motion.

I declare on 29th of April 2021 the collect call was made and that Mr. Arnett has been contacted by family and friends under penalty of perjury all of the above is true pursuant to 28 U.S.C. § 1746 151 ~~Q 5244~~